



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
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DALLAS, TEXAS 75202 - 2733

Office of the Regional Administrator

May 5, 2017

Mr. Danny Nevarez  
Deputy Director  
Environmental Health Department  
City of Albuquerque  
Post Office Box 1293  
Albuquerque, New Mexico 87103

Dear Mr. Nevarez:

Thank you for your letter dated September 15, 2016, to the U.S. Environmental Protection Agency, regarding the May 7, 2014, monitored exceedance of the Particulate Matter less than or equal to 10 micrometers in diameter (PM<sub>10</sub>) National Ambient Air Quality Standard of 150 µg/m<sup>3</sup> at the South Valley monitor. The claimed exceptional event is a high wind dust event in the area.

The U.S. Environmental Protection Agency promulgated the Exceptional Events Rule in 2007 (72 FR 13560, March 22, 2007), here referred to as '2007 Exceptional Events Rule,' pursuant to the 2005 amendment of the Clean Air Act Section 319. The 2007 Exceptional Events Rule was in effect until September 30, 2016, when a revised Exceptional Events Rule was issued (81 FR 68216, October 3, 2016). The City of Albuquerque demonstration dated September 15, 2016, was submitted in accordance with the 2007 Exceptional Events Rule.

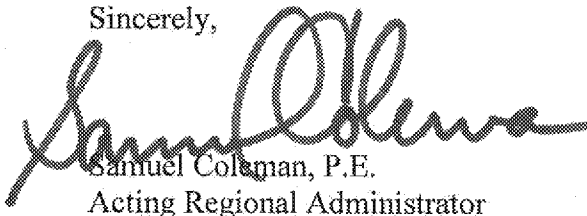
The EPA has completed its review of the demonstration to ensure it meets the requirements found at 40 Code of Federal Regulations §50.14. The EPA concurs with the demonstration and will place a concurrence flag in the appropriate field for the data record in the EPA Air Quality System database. The demonstration meets the schedule and procedural requirements set forth in 40 CFR §50.14(c)(2)(iii). The EPA is satisfied the demonstration provides the necessary information to justify data exclusion and appropriate evidence required by 40 CFR §50.14(c).

The EPA will exclude the PM<sub>10</sub> data for the May 7, 2014, event at the South Valley monitor from proposed regulatory actions, such as a proposed designation, classification, attainment demonstration or finding as to whether the area around the monitor site has met the daily PM<sub>10</sub> National Ambient Air Quality Standard. If the EPA pursues one of these regulatory actions for the area, we will open a new comment period during which we may receive comments on the exceptional events submission the City of Albuquerque made and the determination conveyed in this letter. If any such comments are received, the EPA must consider and respond to such comments before taking final regulatory action.

Accordingly, the determinations conveyed in this letter do not constitute final EPA action regarding any matter on which the EPA is required to provide an opportunity for public comment. In particular, this applies to determinations regarding the attainment status or classification of the area. Final actions will take place only after the EPA completes public notice and comment on those determinations.

We appreciate the work and effort by the City of Albuquerque to develop the exceptional events demonstration. Details regarding our review are provided in the enclosure. If you have any questions, please contact me at (214) 665-2100, or your staff may contact Ms. Frances Verhalen, P.E., Chief, Air Monitoring and Grants Section, at (214) 665-2172.

Sincerely,

A handwritten signature in dark ink, appearing to read "Samuel Coleman". The signature is fluid and cursive, with a large, stylized "S" at the beginning and a long, sweeping underline that extends to the right.

Samuel Coleman, P.E.  
Acting Regional Administrator

Enclosure

**Enclosure**  
**City of Albuquerque, NM, May 7, 2014, PM<sub>10</sub> Exceptional Events Demonstration dated**  
**September 15, 2016**  
**Technical Review Summary**

**Introduction**

The U.S. Environmental Protection Agency (EPA) promulgated the Exceptional Events Rule (EER) in 2007 (72 FR 13560, March 22, 2007) here referred to as '2007 EER,' pursuant to the 2005 amendment of the Clean Air Act Section 319. The 2007 EER was in effect until September 30, 2016, when a revised EER was issued (81 FR 68216, October 3, 2016) here referred to as '2016 EER.' The September 15, 2016, demonstration package was submitted in accordance with the 2007 EER. This evaluation acknowledges the 2007 rule criteria and the 2016 requirements.

As a requirement of the 2007 EER, data claimed to be due to an exceptional event must be flagged in the EPA Air Quality System (AQS) database, an initial description of the event shall be provided to the EPA, and notice and opportunity for public input must occur. Failure to meet these criteria will result in non-concurrence with the flagging of the measured National Ambient Air Quality Standard (NAAQS) exceedance(s).

The procedural elements of the 2007 EER require air agencies to flag claimed event-influenced data resulting in a monitored exceedance or violation in the AQS database, provide the EPA with an initial description of the event, and document that the public comment process was followed. Additionally, under 40 CFR §50.14(c)(3)(iv) of the 2007 EER, the air agency demonstration to justify exclusion of data must provide evidence that:

- A. "The event satisfies the criteria set forth in 40 CFR §50.1(j)" for the definition of an exceptional event;
  - The event "affects air quality."
  - The event "is not reasonably controllable or preventable."
  - The event is "caused by human activity that is unlikely to recur at a particular location or [is] a natural event."
- B. "There is a clear causal relationship between the measurement under consideration and the event that is claimed to have affected the air quality in the area;"
- C. "The event is associated with a measured concentration in excess of normal historical fluctuations, including background;" and
- D. "There would have been no exceedance or violation but for the event."

We address our review of the City of Albuquerque (COA) demonstration with respect to these criteria in the remainder of the document. Because the 2016 EER is now effective, we also address our review of the demonstration under the provisions of the 2016 EER. After considering the information and analyses in the demonstration, the EPA reviews the demonstration package using a weight of evidence approach and decides to concur or not to concur with each flag. Air agencies must satisfy all of the EER criteria for the EPA to concur on an exceptional event claim.

EPA has reviewed available information, summarized in the table below, about a high wind dust event claimed as the cause of an exceedance of the PM<sub>10</sub> NAAQS of 150 µg/m<sup>3</sup> on May 7, 2014, at the South Valley monitor. The EPA finds that the weight of evidence is sufficient for concurrence with the flagged data. A summary of the EPA technical evaluation of the evidence provided in the exceptional event demonstration in relation to the above six criteria follows:

Exceedance Date	Monitor/Site Name	AQS ID	24-hour Avg (µg/m <sup>3</sup> )	Event Type
May 7, 2014	South Valley	35-001-0029	164.2 µg/m <sup>3</sup>	High wind dust

Criterion 1: The event affects air quality

Wind data and measured PM<sub>10</sub> concentrations show that the event affected air quality. (See COA demonstration, Conclusion Section, beginning on page 26.)

Criterion 2: The event was not reasonably controllable or preventable

The demonstration showed that the exceedance was due to a natural and unpreventable high wind dust event. The high wind dust event was capable of overwhelming the reasonable controls on the contributing anthropogenic sources and causing emissions from natural undisturbed areas. (See COA demonstration, Conclusion Section, beginning on page 26 and Actions Taken by the City of Albuquerque, pages 14-25.)

Criterion 3: The event was caused by human activity unlikely to reoccur or was a natural event

The demonstration showed that the exceedance was due to a high wind dust event. Because contributing anthropogenic sources were reasonably controlled, the EPA considers the event to be a natural event. This natural phenomenon is mentioned in the preamble to the EPA Exceptional Events Rule as eligible for evaluation as a possible exceptional event. [See 72 FR 13565, 13566 and 13576 (March 22, 2007) and 81 FR 68279 (October 3, 2016)]. (See COA demonstration, Conclusion Section, beginning on page 26.)

Criterion 4: There is a clear causal relationship between the measurement and the event

Based on the EPA's review of the clear causal relationship criterion using a weight of evidence approach, COA's demonstration sufficiently shows that a high wind dust event clearly caused the exceedance. There were sustained winds in the area above the 25 miles per hour (mph) threshold and timely wind alerts were issued from local and federal authorities. There is a good correlation between the high winds and elevated hourly measurements at the monitor. Controls were sufficiently implemented and enforced on anthropogenic sources. (See COA demonstration, Conclusion Section, beginning on page 26.)

Criterion 5: The event was in excess of normal historical fluctuations

The exceedance was unusual for this monitor based on a comparison of the exceedance with historical data from the monitor. (See COA demonstration, Conclusion Section, beginning on page 26.)

Criterion 6: There would have been no exceedance or violation but for the event

The weight of evidence provided in the demonstration about the wind data on the exceedance day, the implementation of reasonable controls and the comparison to historical data leads EPA to concur that there would have been no exceedance but for the claimed exceptional event. (See COA demonstration, Conclusion Section, beginning on page 26.)

**Schedule and Procedural Requirements**

Specific schedule and procedural requirements an air agency must follow to request data exclusion are identified in 40 CFR §50.14(c). EPA's evaluation shows the criteria were met.

**Conclusion**

The demonstration meets the necessary statutory and regulatory criteria for an exceptional event and sufficiently demonstrates to EPA's satisfaction that the high wind dust event caused the measured PM<sub>10</sub> exceedance.

